

# Exhibit D

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**From:** Kazim Naqvi <KNaqvi@sheppardmullin.com>  
**Sent:** Monday, June 6, 2022 9:56 AM  
**To:** Osborne, Juli (Bay Area); Rena Andoh  
**Cc:** #C-M SKYRYSE - MOOG - LW TEAM; green.a@wssllp.com; Lai Yip; MSubjeck@hodgsonruss.com; pmuto@hodgsonruss.com; rdutta@hodgsonruss.com; RFluskey@hodgsonruss.com; Travis Anderson; Tyler Baker; tflynn@harrisbeach.com; truitt.a@wssllp.com  
**Subject:** RE: Moog v. Skyryse, No. 22-cv-187 (W.D.N.Y.)

Counsel:

We have received your two meet and confer letters sent on Saturday at 2:07 PM PST.

The first letter purports to provide a summary of the Parties' May 31 meet and confer call. Suffice it to say, we strongly disagree with the majority of the self-serving and misleading summary in the letter. The letter requests that Moog supplement its response to Interrogatory No. 1 on or before June 17, 2022. We will not agree to that demand. As Judge McCarthy noted in his May 25 e-mail, "how can [Moog] be expected to [identify its trade secrets] now, when it does not yet know the full extent of what was taken?" Skyryse's continued attempts to blow through Judge McCarthy's directives are improper. Moog will not be able to understand the full extent of what was taken until it has, at minimum, reviewed all of the electronic devices in iDS's possession, taken depositions, and expedited discovery is completed. The mere fact that Skyryse has produced certain documents does not trigger any further disclosure obligations by Moog. Moog will provide further specificity regarding the trade secrets it understands Defendants have misappropriated when appropriate and/or ordered by the Court, not on Skyryse's self-imposed deadline.

The letter also asks Moog to supplement its interrogatory responses in accordance with Rule 33(d) by June 8. That request, upon 4 days' notice, is inappropriate and unreasonable. Moog will provide supplementation as indicated and will aim to complete such supplementation by June 17.

The second letter purports to identify certain deficiencies in Moog's written discovery responses served on April 13. Skyryse raising these issues now, immediately after Moog made its large document production, speaks for itself. Regardless, we disagree with the positions in the second letter. The letter also demands that Moog be prepared to discuss each of the RFPs at issue during the Parties' June 6 meet and confer, which was coordinated at Skyryse's request to discuss its responses to Moog's RFPs. We are prepared to meet and confer with you regarding the RFPs at issue in the letter, but not during today's meet and confer that is reserved for other matters. Demanding a meet and confer on several discovery issues on zero business days' notice is improper. We will make ourselves available to meet and confer on Thursday or Friday afternoon regarding Skyryse's RFPs. Please provide your availability.

Thank you,  
Kazim

**Kazim Naqvi**  
**SheppardMullin** | Los Angeles  
+1 424-288-5336 | ext. 15336

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**From:** julianne.osborne@lw.com <julianne.osborne@lw.com>  
**Sent:** Saturday, June 4, 2022 2:07 PM  
**To:** Rena Andoh <RAndoh@sheppardmullin.com>; Kazim Naqvi <KNaqvi@sheppardmullin.com>  
**Cc:** SKYRYSEMOOG.LWTEAM@lw.com; green.a@wssllp.com; Kazim Naqvi <KNaqvi@sheppardmullin.com>; Lai Yip

<LYip@sheppardmullin.com>; MSubjeck@hodgsonruss.com; pmuto@hodgsonruss.com; rdutta@hodgsonruss.com; RFluskey@hodgsonruss.com; Travis Anderson <TAnderson@sheppardmullin.com>; Tyler Baker <TBaker@sheppardmullin.com>; tflynn@harrisbeach.com; truitt.a@wssllp.com  
**Subject:** Moog v. Skyrise, No. 22-cv-187 (W.D.N.Y.)

Dear counsel:

Please see the attached correspondence.

Best,  
Juli

**Julianne Osborne**

**LATHAM & WATKINS LLP**  
505 Montgomery Street  
Suite 2000  
San Francisco, CA 94111-6538  
Direct Dial: +1.415.395.8160  
Email: [julianne.osborne@lw.com](mailto:julianne.osborne@lw.com)  
<https://www.lw.com>

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